

MELANIE A. HILL
Nevada Bar No. 8796
Law Office of Melanie Hill
9345 W. Sunset Road, Suite 100
Las Vegas, Nevada 89148
Tel.: (702) 362-8500
Fax: (702) 362-8505
Melanie@MelanieHillLaw.com
Attorney for Defendant Jeremy Halgat

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JEREMY HALGAT,

Defendants.

2:13-cr-00239-JAD-PAL

**STIPULATION TO EXTEND TIME FOR
DEFENDANT HALGAT TO FILE
OBJECTIONS TO THE MAGISTRATE
JUDGE'S ORDER DENYING
DEFENDANT'S EMERGENCY
MOTION TO COMPEL (Dkt # 142) AND
MOTION FOR RECONSIDERATION
OF THE ORDER DENYING
DEFENDANT'S MOTIONS IN LIMINE
(Dkt # 134)**

(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United States Attorney, and Cristina Silva and Andrew Duncan, Assistant United States Attorneys, counsel for the United States of America, and Melanie A. Hill, counsel for defendant Jeremy Halgat that the deadline for Defendant Halgat to file objections to the Magistrate Judge's order denying Defendant Halgat's emergency motion to compel (Dkt # 142) and the deadline for Defendant Halgat to file a motion for reconsideration of the order denying various motions in limine (Dkt # 134) be continued one week from January 27, 2014 up to and including February 3, 2014.

At the request of Defendant's counsel, counsel for the Government agreed to stipulate to this first request for an extension as a professional courtesy among counsel in requesting that the Court allow Defendant Halgat a seven (7) day extension of time to file his objections to the Magistrate

1 Judge's order denying Defendant Halgat's emergency motion to compel (Dkt # 142) and the
2 deadline for Defendant Halgat to file a motion for reconsideration of the order denying various
3 motions in limine (Dkt # 134). Counsel for Defendant Halgat timely made this extension request
4 to counsel for the Government yesterday, January 27, 2014 (before the deadline expired), but was
5 unable to get a stipulation drafted and approved by counsel for the Government before the close of
6 business yesterday due to other filing deadlines counsel for Defendant, Melanie Hill, had to meet,
7 i.e. filing objections in a federal civil case, Krause v. Nevada Mutual, 2:12-cv-00342-JCM-CWH¹
8 and filing a motion to continue trial in another federal criminal case, United States v. Sanford, 2:13-
9 cr-00120-APG-GWF that counsel filed under seal this morning.

10 In addition to the reasons above, counsel for Defendant Halgat also requested this extension
11 from counsel for the Government and is respectfully requesting that the Court extend these deadlines
12 for the following reasons: (1) counsel for Defendant Halgat is a sole practitioner and is currently
13 preparing motions in Mr. Halgat's other criminal case, United States v. Halgat, 2:13-cr-00241-APG-
14 VCF, that are due this Friday, January 31, 2014; and (2) one of counsel for Defendant Halgat's other
15 client's who is incarcerated in Pahrump's father passed away yesterday and counsel spent time
16 speaking with the family and arranging with the Nevada Southern Detention Center to inform them
17 and her client of her father's passing.

18 Counsel for Defendant Halgat respectfully requests that the Court grant this stipulation
19 allowing the Defendant a one week extension finding that excusable neglect prevented Counsel for
20 Defendant Halgat from filing the stipulation before the expiration of the deadline on January 27,
21 2014. Counsel contends that this modest extension would not unduly delay or prejudice anyone in
22 this matter and is warranted under the circumstances and based on the current trial date of May 13,
23

24 ¹ The objection deadline in the Krause case had been twice extended due to
25 counsel's federal criminal trial schedule in the instant case and co-counsel, Kathy England's, trial
26 schedule in another federal civil case that concluded on January 24, 2014 before Judge Gordon,
27 Cox/Keenan v. Toys R Us, 2:05-cv-00615-APG-VCF (that counsel is also co-counsel of record on,
28 but was unable to assist in the trial due to her trial schedule in the instant case). Ms. England was
unable to prepare the objections in the Krause case because she was preparing her findings of fact
and conclusions of law from the Cox/Keenan bench trial that were due to Judge Gordon yesterday,
January 27, 2014.

2014.

This is the first request to extend the objections and motion for reconsideration deadlines filed herein.

THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE that the time for Defendant Halgat to file objections to the Magistrate Judge's order denying Defendant Halgat's emergency motion to compel (Dkt # 142) and the deadline for Defendant Halgat to file a motion for reconsideration of the order denying various motions in limine (Dkt # 134) be continued one week from January 27, 2014 up to and including February 3, 2014.

RESPECTFULLY SUBMITTED this 28th day of January, 2014.

DANIEL G. BOGDEN
United States of America

/s/ Cristina Silva

By: _____
CRISTINA SILVA
Assistant United States Attorney
Counsel for the Plaintiff

LAW OFFICE OF MELANIE HILL

/s/ Melanie A. Hill

By: _____
MELANIE A. HILL
Counsel for Defendant Jeremy Halgat

ORDER


Based on the parties' stipulation and good cause appearing,

IT IS HEREBY ORDERED that Defendant Halgat shall have up through and including 5:00 p.m. on February 19, 2014, to file objections to the Magistrate Judge's order denying his emergency motion to compel [#142] and a motion for reconsideration of the order denying various motions in limine [#134];

IT IS FURTHER ORDERED that Defendant Halgat's Motion to Extend pending the Court's Ruling on this Stipulation [#151] is **DENIED** as moot.

The parties are further reminded that the motions deadline expired on October 31, 2013, and is not extended by this Order except as expressly set forth in this Order.

Dated: February 14, 2014.


UNITED STATES DISTRICT JUDGE